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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ANA MARIA WASHINGTON,

Plaintiff,

v.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

Case No. 2:25-cv-0471-JDP

STIPULATED MOTION AND ~~PROPOSED~~
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from July 2, 2025 to August 1, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has and will be unable to devote the time required to complete its

1 response. Counsel has multiple merit briefs currently due in district court cases over the next
2 week and was unexpectedly out of the office on June 26-27, 2025 due to illness. Given
3 competing workload requirements and upcoming scheduled leave an extension until August 1,
4 2025 will provide the opportunity for the undersigned Counsel for Defendant to prioritize
5 completing the response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel
6 apologizes to the Court and Plaintiff's counsel for any inconvenience caused by this request and
7 delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

8
9 Respectfully submitted,

10 MICHELE BECKWITH
11 Acting United States Attorney

12 DATE: July 1, 2025

13 By: s/ Oscar Gonzalez de Llano
14 OSCAR GONZALEZ DE LLANO
15 Special Assistant United States Attorney
16 Attorneys for Defendant

17
18 Respectfully submitted,

19 DATE: July 1, 2025

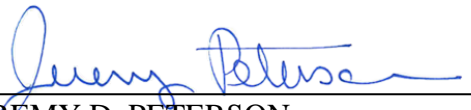
20 By: s/ Margaret Lehrkind
21 Margaret Lehrkind
22 Lehrkind Law Office, P.C.
23 (*as authorized by email)
24 Attorney for Plaintiff
25
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27
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ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including August 1, 2025, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: July 2, 2025



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE